

Planning Statement

Prior Notification for Roof Mounted Solar PV on Non-Domestic Premises

City Football Academy, Ashton New Road, Manchester

Introduction

This Planning Statement has been prepared to accompany a prior notification application submitted pursuant to Schedule 2, Part 14 Class J(c) of the General Permitted Development Order 2015 (as amended) and seeks confirmation that the prior approval of the LPA is not required for the installation of roof mounted photovoltaic solar panels to the following buildings and facilities located within the City Football Academy complex:

- Joie Stadium;
- Central Training Facility (Performance Centre);
- Facilities Management & Laundry Building.

Site Location & Context

The application site forms part of the wider part of the Etihad Campus, which includes the Etihad Stadium, Manchester Regional Arena, City Football Academy and the National Squash Centre, with

the area having been a key focus for regeneration since being used to host the Commonwealth Games in 2002.

The City Football Academy (CFA) lies to the south eastern edge of the wider Etihad Campus and opened in December 2014 following the comprehensive regeneration of the 80 acre former Clayton Aniline site. The

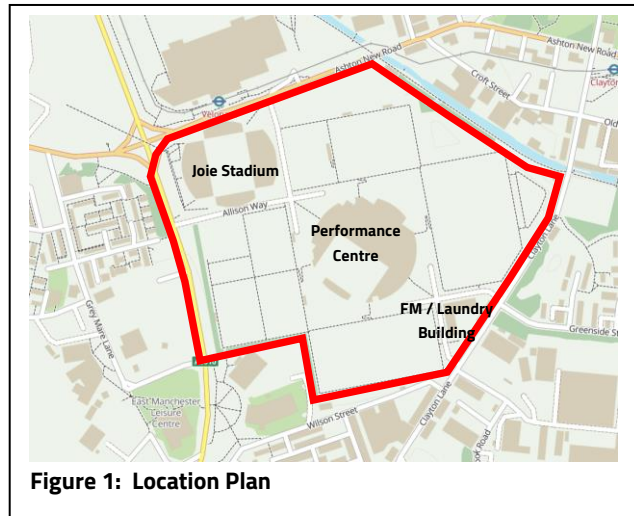


Figure 1: Location Plan

CFA provides a state-of-the-art training facility shared by Manchester City's first team, women's team and academy teams, as well as the world headquarters of the City Football Group and boasts the 7,000 seater Joie Stadium; grass and artificial pitches; the largest indoor pitch in the UK; a media centre; player welfare and gym facilities and other football operations facilities.

Development Proposals

The current application seeks confirmation that the prior approval of the LPA is not required for the installation of roof mounted photovoltaic solar panels to the Joie Stadium; Performance Centre and the Facilities Management / Laundry Building, which form part of the CFA complex, as illustrated overleaf (Figure 2):

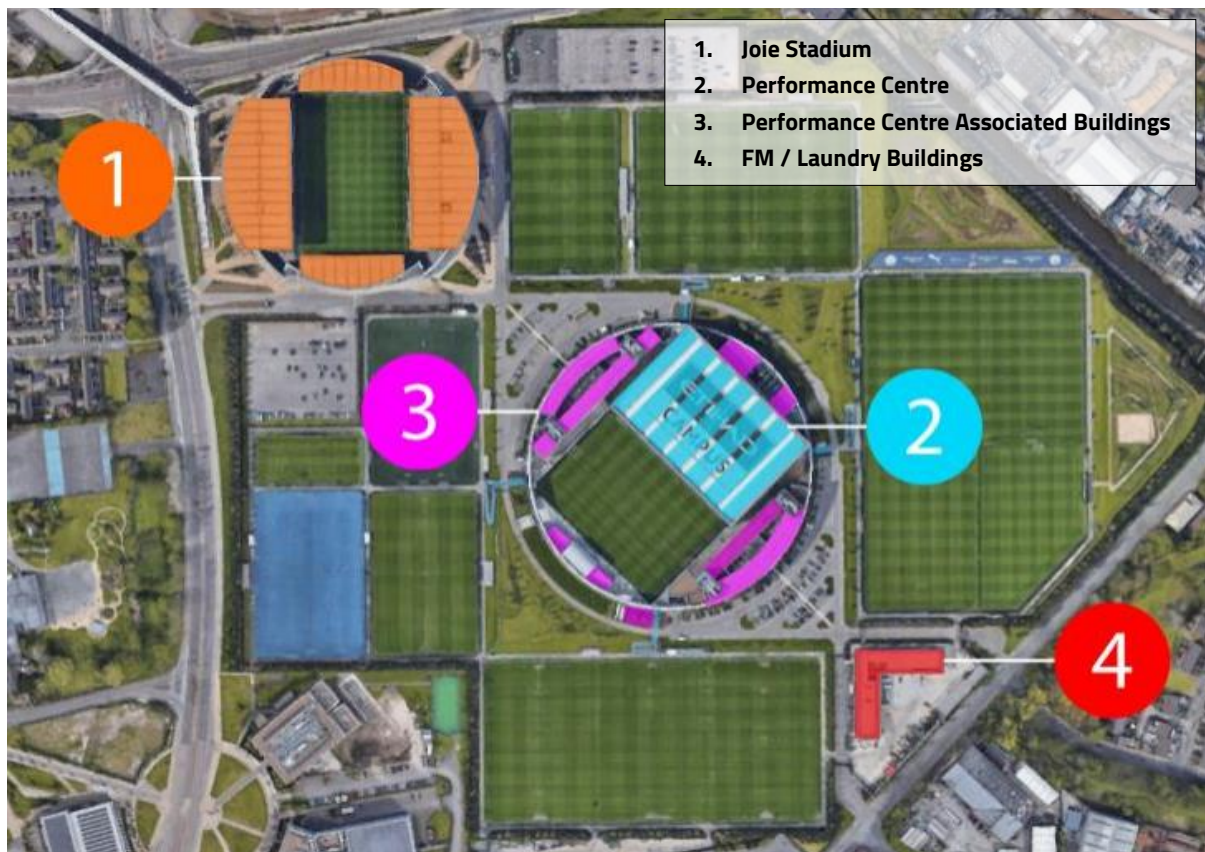


Figure 2: Site Layout

The 7,000 capacity Joie Stadium (1) lies to the north western corner of the CFA complex and the current proposals will deliver roof mounted photovoltaic solar panels to the roofs of each of the four stands. The proposals will deliver 3,116 PV modules and will have a capacity of 1.49MW. The Performance Centre (2 & 3) occupies a central position within the complex and includes the largest indoor pitch in the UK; overnight accommodation; gym and player welfare facilities; offices; a media centre and other associated facilities. The proposals will provide 3,577 PV modules to the roofs of the Performance Centre complex with a capacity of 1.76MW. The Facilities Management / Laundry Building (4) is a single storey structure on an L-shaped plan lying to the south eastern corner of the wider site adjacent to the boundary with Clayton Lane. It is proposed to install 278 PV modules to the roof of the building with a capacity of 0.13MW. The overall scheme will therefore have a capacity of 3.39MW and deliver significant CO₂ savings.

The Etihad Campus has high levels of energy consumption and the application proposals will help to contribute to Manchester City's overarching sustainability and environmental impact goals, as well as supporting a greater degree of energy independence / security by reducing reliance on the National Grid and securing associated reductions in carbon emissions.

'Game Plan 2023: Manchester City's Sustainability & Environmental Report' affirms that sustainability is core to the club's business operations, development, events and community and outlines MCFC's ambitious target of achieving net zero by 2030, which is the lynch pin of the club's sustainability agenda. Game Plan 2023 identifies that the club remains on course to achieve this target and, in the past two decades, they have already made significant progress by:

- Reduced energy consumption – saving up to 2m kwh since 2019;
- Chosen only renewable electricity;
- Reduced waste and forbidden landfill;
- Eradicated single use plastics and eliminating PET;
- Created a new urban forest in East Manchester;
- Provided significant local employment opportunities;
- Implemented a sustainable, local procurement process;
- Harvested over 1bn litres of Manchester's rainwater.

Manchester City are fully committed to being a sustainable organisation and, accordingly, since 2012 have utilised the DERFA (GHG) protocol for its emissions impact measurement and reporting. The continuous use of the protocol ensures that the club can benchmark its actions and results year-on-year with the credibility of the protocol in place. The club measures all its actions and operations, and, in 2022, introduced a measure for embodied carbon, including retrospective measurement for existing properties and their respective development. Although working towards their own goals, Manchester City have also remained closely aligned to key local, national and global

objectives, from the UN Sustainable Development Goals to Manchester's own ambition for net zero city by 2038 with active membership of the Manchester Climate Change Partnership and the British Association of Sustainability in Sport (BASIS).

In 2022-2023 Manchester City used 13.034m kwh of electricity, which is a reduction of over 1.1m kwh in the year and procure 100% renewable energy. The current proposals will enable the club to generate electricity using renewables sources that will meet part of their energy consumption requirements through the proposed roof mounted solar PV equipment in line with their overarching objective to achieve Net Zero, as well as providing a greater degree of energy independence / security.

Manchester City Council also declared a climate emergency in July 2019 and is committed to become a zero-carbon city by 2038. The City Council have committed to halving their carbon emissions in the next five years and the Climate Change Action Plan 2020-25 sets out what Manchester collectively needs to do to *'play its full part in limiting the effects of climate change'* and the current proposals would evidently also positively align with the City Council's carbon reduction plan and overarching objective of tackling the impacts of climate change.

Compliance with Paragraph J.1 of Part 14 Class J of the GPDO

The proposals do not conflict with any of the circumstances outlined at Paragraph J.1(c) of Part 14 Class J of the GPDO whereby development is not permitted in relation to other solar PV equipment on the roof of a building, as follows:

The solar PV equipment or solar thermal equipment would be installed on a pitched roof and would protrude more than 0.2 metres beyond the plane of the roof slope when measured from the perpendicular with the external surface of the roof slope;

The submitted planning drawings demonstrate that the proposed equipment will not protrude more than 0.2m from the plane of the roof slope of the building where installed on a pitched roof.

The solar PV equipment or solar thermal equipment would be installed on a flat roof, where the highest part of the solar PV equipment would be higher than 1 metre above the highest part of the roof (excluding any chimney);

The proposed equipment will not be more than 1m higher than the highest part of the roof where installed on a flat roof, as shown on the submitted planning drawings.

The solar PV equipment or solar thermal equipment would be installed on a roof and within 1 metre of the external edge of that roof;

The required offset from the external edge of the roof will be achieved in all locations.

The solar PV equipment or solar thermal equipment would be installed on a site designated as a scheduled monument;

The site is not designated as a scheduled monument.

The solar PV equipment or solar thermal equipment would be installed on a listed building or a building within the curtilage of a listed building

The equipment will not be installed on a listed building or a building within the curtilage of a listed building.

Compliance with Paragraph J.4(2) of Part 14 Class J of the GPDO

The provisions of Part 14 Class J(c) of the GPDO require the developer to apply to the local planning authority before beginning the development for a determination as to whether the prior approval of the authority will be required as to the design and external appearance of the development, in particular the impact of glare on occupiers of neighbouring land.

The buildings to which the roof mounted solar PV equipment is to be installed form part of the wider CFA complex and, in view of the size and layout of the site, as well as the security fencing and extensive soft landscaping to the main site boundaries, the buildings in question are largely visually contained. There are extremely limited public views available of the Performance Centre and FM / Laundry buildings and, accordingly, there will be limited views available of the PV modules to be installed to these buildings, particularly as they will be within the limitations of the permitted development rights in terms of height relative to the highest part of the existing roof and will also be screened by the parapets of the respective buildings.

There are more extensive views available of the Joie Stadium from Ashton New Road and Alan Turing Way, however, given the height of the stadium and the orientation and height of the proposed PV modules, it is evident that they would not form visually intrusive features in the wider streetscene that would undermine the character and appearance of the area. Nonetheless, roof mounted solar equipment has been installed to a number of commercial, community and leisure / sport buildings within the local area and evidently would not form incongruous features within this mixed use setting.

The level of visual containment afforded by the size, layout and boundary treatments of the CFA site, as well as the height of the roofs of the buildings to which the PV modules will be installed relative to the surrounding buildings will also ensure that the proposed equipment does not give rise to unacceptable impacts on neighbouring occupiers as a result of glint and glare. This position is supported by the findings of the submitted Solar Glare Hazard Analysis produced by Greencat Renewables, which states as follows in relation to ground based receptors:

'The 'Solar Photovoltaic Development Glint and Glare Guidance' by Pager Power highlights that roads and dwellings are typically excluded from assessments for building developments, as the potential for glint and glare effects requires a view of the solar panels. This is particularly relevant for the Proposed Development as the PV panels are mounted at 0° and 10° angles on the roofs of each structure, meaning a direct view of each array is geometrically unlikely for surrounding ground-based receptors. Given that the minimum roof height of the Proposed Development (and thus the minimum height of the array at that location) is approximately 5.9m and higher than a typical second-floor window, the likelihood of glare reaching ground level is extremely low. Moreover, the significance of potential reflections diminishes with distance, and changes in vegetation or new building developments may reduce glint and glare impacts even further.'

The Solar Glare Hazard Analysis also identifies that the proposals would not give rise to unacceptable impacts on aviation receptors as a result of glint and glare.

Conclusions

The current proposals involve the installation of roof mounted solar PV equipment to a range of buildings within the CFA complex to support Manchester City's overarching sustainability goals and target of achieving Net Zero by 2030. The proposals would clearly satisfy the conditions of Paragraph J.1 of Part 14 Class J of the GPDO and, in terms of the design and external appearance of the proposed development, it is evident that the presence of roof mounted PV equipment would not form a visually intrusive feature within the wider mixed use setting that would undermine the character of the local area and would not give rise to unacceptable impacts on neighbouring occupiers as a result of glint and glare.

On this basis, it is not considered that prior approval should be required in this instance and we would be grateful if the LPA could confirm such at the earliest convenience to enable the clear benefits of the scheme in terms of supporting both MCFC's and the City Council's overarching sustainability agenda to be delivered.